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Attorneys for Defendants

COUNTY OF ALAMEDA, GREGORY J. AHERN

in his capacity as Sheriff for County of Alameda,

and Deputies MATTHEW AHLF, ALEJANDRO

VALVERDE, JOSHUA SWETNAM, ROBERTO

MARTINEZ, ZACHARY LITVINCHUK, RYAN

MADIGAN, MICHAEL BARENO, FERNANDO

ROJAS-CASTANEDA, SHAWN SOBRERO,

SOLOMON UNUBUN, all individually and in their

official capacities as Deputy Sheriffs for County of

Alameda, and MEGAN HAST, A.S.W.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

M.H., a minor, individually through his Guardian
Ad Litem, Michelle Henshaw, et al.,

Plaintiffs,

v.

COUNTY OF ALAMEDA, et al,

Defendants.

Case No.: 3:11-cv-02868-JST

**STIPULATION AND ~~(PROPOSED)~~
ORDER AMENDING CASE
MANAGEMENT ORDER TO EXTEND
EXPERT DISCOVERY CUTOFF**

Action Filed: June 10, 2011

Trial: March 10, 2014

ALL PARTIES, THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY
STIPULATE AND REQUEST THIS COURT TO ORDER THAT the case management order shall
be amended to extend the deadline to complete expert discovery from to February 10, 2014 to
February 20, 2014 only for the purpose of taking the deposition of Thomas Rogers, M.D., the
pathologist who performed the autopsy on Martin Harrison on behalf of Alameda County.

1 The reasons for this requested continuance are as follows: This is a complex civil rights
2 wrongful death case involving sixteen named defendants who are represented by three different
3 defense firms. The parties have disclosed a total of fourteen retained expert witnesses. On
4 December 6, 2013, the court granted the parties' stipulation to extend the expert discovery deadline
5 from January 20, 2014 to February 10, 2014. The parties have since completed all retained expert
6 depositions to date, with the exception of one scheduled for February 8.

7 Plaintiffs' counsel's attempts to reach Dr. Rogers by telephone to schedule his deposition
8 were unsuccessful, so Plaintiffs served him with a subpoena on January 15, 2014, scheduling his
9 deposition for February 7 and asking him to contact Plaintiffs' counsel if he needed to change the
10 date or time for his deposition. Dr. Rogers did not ask to change the date. On January 21, 2014,
11 Plaintiff's counsel informed defense counsel of the date for Dr. Rogers' deposition and asked
12 whether it presented a problem for any counsel. On January 21, 2014, Counsel for Corizon
13 confirmed their availability and on January 23, 2014, counsel for Alameda County confirmed their
14 availability. Plaintiffs' counsel noticed the deposition and sent Dr. Rogers a letter on January 24,
15 2014, confirming his deposition for February 7, 2014.

16 On January 31, 2014, counsel for Alameda County informed Plaintiffs' counsel that Dr.
17 Rogers cannot attend the deposition on the noticed date due to previously scheduled autopsies in San
18 Mateo County. There is no date that all counsel and Dr. Rogers are available prior to the expert
19 discovery deadline of February 10. All counsel and Dr. Rogers are available on February 20, 2014 at
20 2:00 p.m. for deposition.

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THEREFORE, THE PARTIES RESPECTFULLY REQUEST that this Court extend the expert discovery cutoff from February 10, 2014 to February 20, 2014 only for the purpose of taking the deposition of forensic pathologist Thomas Rogers, M.D., who will appear at the offices of Haddad & Sherwin for his deposition at 2:00 p.m. on that date.

Dated: January 31, 2014

HADDAD & SHERWIN

/s/ Julia Sherwin

JULIA SHERWIN

Attorneys for Plaintiffs JOSEPH HARRISON,
KRYSTLE HARRISON, MARTIN HARRISON
JR. and TIFFANY HARRISON

Dated: January 31, 2014

ANDRADA AND ASSOCIATES

/s/ Valerie Ly

J. RANDALL ANDRADA

VALERIE LY

Attorneys for Defendants
COUNTY OF ALAMEDA, GREGORY G. AHERN,
MATTHEW ALHF, ALEJANDRO VALVERDE,
JOSHUA SWETNAM, ROBERTO MARTINEZ,
ZACHARY LITVINCHUK, RYAN MADIGAN,
MICHAEL BARENO, FERNANDO ROJAS-
CASTANEDA, SHAWN SOBRERO, SOLOMON
UNUBUN, and MEGAN HAST, A.S.W.

Dated: January 31, 2014

LAW OFFICES OF NANCY E. HUDGINS

/s/ Nancy Hudgins

NANCY E. HUDGINS

MATTHEW M. GRIGG

CAROL M. HO

Attorneys for Defendants
HAROLD ORR, JR., M.D. and CORIZON HEALTH,
INC.

1 Dated: January 31, 2014

WILLIAMS & ASSOCIATES

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3 /s/ *Martha Stringer*

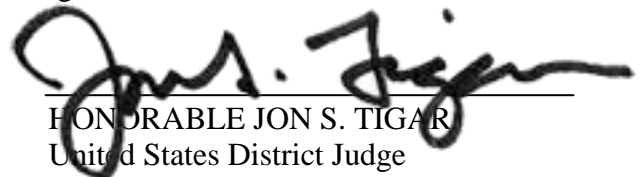
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5 MARTHA STRINGER
6 Attorneys for Defendant
7 ZELDA SANCHO, L.V.N.
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(PROPOSED) ORDER

Pursuant to the stipulation of the parties and good cause appearing therefore, IT IS SO ORDERED. The case management order shall be amended to extend the deadline to complete expert discovery from February 10, 2014 to February 20, 2014 only for the purpose of taking the deposition of forensic pathologist Thomas Rogers, M.D.

Dated: February 4, 2014


HONORABLE JON S. TIGAR
United States District Judge

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